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A LEGAL LOOPHOLE: INTERNET SALES OF “PARTIALLY COMPLETED LOWER RECEIVERS” CIRCUMVENT FEDERAL AND CALIFORNIA FIREARMS LAWS

PREPARED FOR:

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“I am a resident of the state of California and this is my AR-15 rifle. I acquired it legally in late 2006—6 years after the passage of the so-called ‘Assault Weapons Ban.’ I built it myself with standard household tools even though I had no prior experience. It is easy to build, it looks and shoots great, and best of all, it is perfectly legal.

Here is how you can build your own. ”

—David, Blog.Riflegear.com

EXECUTIVE SUMMARY

On June 7, 2013, John Zawahri killed five people and injured several more during a shooting rampage in Santa Monica, California. The shooter had a history of mental illness. In 2006, a teacher at his high school discovered Zawahri researching assault weapons online. School officials contacted the police and Zawahri was subsequently admitted to the psychiatric ward at the University of California, Los Angeles Medical Center. He attempted to buy a weapon in 2011, but a background check conducted by the California Department of Justice found him ineligible and denied the purchase.

Despite this denial, Zawahri was able to obtain an AR-15 assault rifle that held 30 rounds of ammunition. California state law bans the sale of AR-15 rifles with a magazine capacity greater than 10 rounds. Authorities believe that Zawahri assembled his AR-15 rifle using parts he bought in pieces from a number of different sources, including an “80% completed lower receiver.” Police found a drill press at Zawahri’s home, a tool that can make holes in the lower receiver to complete the weapon.

A lower receiver holds the firing mechanism of a gun and is classified as a “firearm” under state and federal laws. Individuals purchasing completed lower receivers are bound by the same laws that regulate the purchase of assault weapons. Because 80% completed lower receivers are partially completed, they are often not regulated as firearms, creating legal loopholes to allow individuals to obtain and use weapons that would otherwise be banned.

At the request of Ranking Member Henry A. Waxman, minority staff of the Committee on Energy and Commerce investigated the extent of this loophole, identifying a thriving market that exists for 80% completed lower receivers that circumvent federal and state background check and other gun laws. The investigation has found:

- **Internet gun sellers are selling partially completed lower receivers to circumvent California and federal firearms license (FFL) requirements.** For example, one seller, American Spirit Arms, announced the release of a 95% Completed AR-15 Lower Receiver and wrote “NO FFL NEEDED FOR PURCHASE. This item can be shipped directly to your house.” The posting assures prospective buyers that “[p]er our extensive interaction with the ATF these are 100% Legal to sell to without the need of a FFL Transfer. We are making it easier than ever for the end user to manufacturer their own firearm.”

- **Some gun enthusiasts are promoting partially completed lower receivers to circumvent federal serial number requirements for firearms.** One gun enthusiast posted that a partially completed lower receiver was “[o]n sale for 129.99 No serial number no govt tracking.”
- **Gun sellers are using the prospect of new legislation restricting the purchase of firearms as part of their advertising campaigns.** One online retailer, Marsh Hawk Arms, told prospective purchasers: “I do not know if the gun-ban crowd will be trying to outlaw homebuilt guns as part of the ‘universal background check’ legislation they are pushing, but I wouldn’t put it past them. Now is obviously the time to make sure you have a receiver for every kit you have or will buy in the future. A kit won’t do you any good if you don’t have a receiver for it.” Some gun enthusiasts reinforce this message. One activist wrote, “The trick is to have an unregistered weapon ... an unregistered weapon that you legally built yourself.”
- **YouTube videos and gun websites provide step-by-step tutorials on the process for building a complete assault rifle from an 80% partially completed lower receiver.** For instance, the New Rifleman, a blog celebrating AR-15 firearms, provides a comprehensive visual guide explaining how to “easily put together your first AR-15.”
- **Gun owners in California can circumvent the California assault weapons ban by purchasing complete assault rifle parts kits from out-of-state-vendors and assembling them at home.** Companies -- such as 44Mag Distributing located in Oregon, Cope’s Distributing located in Ohio, Brownells located in Iowa, and Exile Machine located in Texas -- ship disassembled automatic rifles into California as “repair” or “rebuild” kits, ostensibly intended to repair registered weapons. These “parts kits” can be easily rebuilt into illegal, unregistered assault rifles.

I. BACKGROUND

On June 7, 2013, John Zawahri, 23, killed five people and injured several more during a shooting rampage that lasted approximately 13 minutes in Santa Monica, California.¹ He first shot and killed his father, Samir Zawahri, and brother, Christopher, at their home.² He then pulled over and carjacked Laurie Sisk, forcing her to drive at gunpoint to Santa Monica College.³ Zawahri shot at numerous cars, pedestrians, and a bus en route, killing the college's groundskeeper, Carlos Franco, and his daughter, Marcela. Upon arriving at the campus, he then fatally shot another woman, Margarita Gomez.⁴ He then entered the school library, where he attempted to kill several library patrons who were hiding in a safe room. Police, who had been alerted to the shooting and to Zawahri's location by numerous 911 calls, exchanged gunfire in the library with the shooter and pronounced him dead at the scene.⁵ According to authorities, Zawahri fired approximately 100 rounds in total.⁶

Zawahri had a history of mental illness. In 2006, a teacher at his high school discovered Zawahri researching assault weapons online.⁷ School officials contacted the police and he was subsequently admitted to the psychiatric ward at the University of California, Los Angeles Medical Center.⁸ Zawahri attempted to buy a weapon in 2011, but a background check

¹ *Santa Monica Shooting Death Toll Rises to 6; Wounded Victim Dies of Her Injuries*, Huffington Post (June 9, 2013) (online at www.huffingtonpost.com/2013/06/09/santa-monica-shooting-death-toll_n_3411954.html).

² *Santa Monica Gunman Fired 100 Rounds During Rampage, Officials Say*, Los Angeles Times (June 12, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gunman-100-rounds-20130612,0,3495106.story).

³ *Santa Monica Shooting Survivor: 'Thank God, I'm Alive,'* CNN (June 11, 2013) (online at www.cnn.com/2013/06/10/justice/california-college-gunman/).

⁴ *Santa Monica Gunman Fired 100 Rounds During Rampage, Officials Say*, Los Angeles Times (June 12, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gunman-100-rounds-20130612,0,3495106.story).

⁵ *Santa Monica shooting survivor: 'Thank God, I'm Alive,'* Los Angeles Times (June 11, 2013) (online at www.cnn.com/2013/06/10/justice/california-college-gunman/); *Santa Monica Gunman Wrote Apology, Was Denied Weapon by State*, Los Angeles Times (June 13, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gunman-had-been-denied-weapon-in-2011-20130613,0,7640331.story).

⁶ *Santa Monica Gunman Fired 100 Rounds During Rampage, Officials Say*, Los Angeles Times (June 12, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gunman-100-rounds-20130612,0,3495106.story).

⁷ *Santa Monica Shooter's Rifle Appears to Have Been Pieced Together*, Los Angeles Times (June 12, 2013) (online at www.latimes.com/news/local/la-me-santa-monica-gun-20130613,0,1511956.story).

⁸ *Id.*

conducted by the California Department of Justice found him ineligible and denied the purchase.⁹ The reasons for this denial have not been publicly released.¹⁰

Zawahri used a modified AR-15 rifle in the shooting and also carried a .44-caliber handgun.¹¹ He possessed more than 1,300 rounds of ammunition.¹² The AR-15 rifle is the same type of gun used in the mass shootings that occurred in Aurora, Colorado, and Newtown, Connecticut.¹³ The AR-15 firearm held 30 rounds. California state law bans the sale of AR-15 rifles with a magazine capacity greater than ten rounds.¹⁴ Authorities believe that Zawahri assembled his AR-15 rifle using parts he bought in pieces from a number of different sources, including an 80% completed lower receiver.¹⁵ Police found a drill press at Zawahri's home, a tool that can make holes in the lower receiver to complete the weapon.¹⁶

II. FEDERAL AND CALIFORNIA LAWS GOVERNING FIREARMS

California citizens must undergo an extensive background check prior to a firearms purchase. They must complete a Personal Firearms Eligibility Check (PFEC) conducted by the California Department of Justice. The Department reviews state and federal databases to determine whether applicants can legally possess and purchase firearms. The Department denies purchase to applicants that have been convicted of a felony, have a history of mental illness, are addicted to narcotics, or are the subject of a domestic violence restraining order. Only a PFEC-eligible individual may legally purchase firearms.¹⁷ When a PFEC-eligible purchaser wants to obtain a specific firearm, he must pass a second background check and undergo a ten-day

⁹ *Remorse, but Not Hate, in Note Left by Santa Monica Gunman*, Los Angeles Times (June 13, 2013) (online at articles.latimes.com/2013/jun/13/local/la-me-0614-santa-monica-shooting-20130614).

¹⁰ *Id.*

¹¹ *Rifle Used in Santa Monica College Shooting May Have Been Altered*, Los Angeles Times (June 13, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gun-alterations-20130613,0,4369088.story).

¹² *Id.*

¹³ *Id.*

¹⁴ *Rifle Used in Santa Monica College Shooting May Have Been Altered*, Los Angeles Times (June 13, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gun-alterations-20130613,0,4369088.story).

¹⁵ *Remorse, but Not Hate, in Note Left by Santa Monica Gunman*, Los Angeles Times (June 13, 2013) (online at articles.latimes.com/2013/jun/13/local/la-me-0614-santa-monica-shooting-20130614).

¹⁶ *Santa Monica College Shooting: Gunman Left Note*, ABC News (June 13, 2013) (online at abclocal.go.com/ktrk/story?section=news/local/los_angeles&id=9138446).

¹⁷ California Penal Code §12001.

waiting period.¹⁸ Additionally, California state law bans the sale and manufacture of AR-15 rifles with a magazine capacity greater than ten rounds.¹⁹

A lower receiver holds the firing mechanism of a gun. The Gun Control Act of 1968 defines a completed lower receiver as a firearm, triggering a federal background check and a federal firearms license before purchase.²⁰ California background check requirements are also triggered when an individual purchases a completed lower receiver.²¹ Federal law requires that both intact guns and all completed lower receivers must be “conspicuously engraved, cast or stamped” with a serial number.²²

Incomplete lower receivers are partially completed lower receiver frames and are often available in assault weapon parts kits and from online distributors. Because these do not constitute “complete” lower receivers, the same rules do not apply to their sale and distribution.

Provisions in federal law permit individual citizens who are not otherwise prohibited from owning a firearm to build unregistered weapons like the AR-15 used in the Santa Monica shootings from incomplete lower receivers and other parts.²³ Unlicensed individuals may construct firearms for personal use as long as there is no intention to sell or distribute them.²⁴ Additionally, unlicensed individuals are permitted to construct non-sporting semiautomatic rifles, such as the AR-15, that use fewer than ten imported parts.²⁵ Gun builders must comply

¹⁸State of California Department of Justice, Office of the Attorney General, *Frequently Asked Questions: Personal Firearm Eligibility Check Program* (online at <http://oag.ca.gov/firearms>).

¹⁹ *Rifle Used in Santa Monica College Shooting May Have Been Altered*, Los Angeles Times (June 13, 2013) (online at www.latimes.com/local/lanow/la-me-ln-santa-monica-gun-alterations-20130613,0,4369088.story).

²⁰ 18 U.S.C § 921(a)(3); 18 U.S.C § 923.

²¹ See California Penal Code California Penal Code § 16520 (b); see also State of California Department of Justice, Office of the Attorney General, *Frequently Asked Questions: Personal Firearm Eligibility Check Program* (online at <http://oag.ca.gov/firearms>).

²² Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, *Firearms Verification Overview* (online at www.atf.gov/firearms/guides/importation-verification/firearms-verification-overview.html).

²³ 18 U.S.C. Chapter 44. See also Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, *General Questions* (online at www.atf.gov/firearms/faq/general.html#gca-manufacturing).

²⁴ *Id.*

²⁵ 27 C.F.R. § 478.39. See also Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, *Firearms Technology* (online at www.atf.gov/firearms/faq/firearms-technology.html#commercial-parts-assembly).

with state and federal law; it is therefore illegal for an individual in California to construct unregistered assault weapons.²⁶

In many cases, the purchase of parts to build weapons does not trigger California background checks or other requirements, creating potentially significant loopholes.

III. FINDINGS

A. Internet Gun Sellers Are Selling Partially Completed Lower Receivers to Circumvent California and Federal Firearms License Requirements

The Committee staff investigation found that gun sellers are advertising partially completed lower receivers as a way to circumvent California and federal firearms license requirements.

One seller, American Spirit Arms, announced the release of a 95% Completed AR-15 Lower Receiver and wrote “NO FFL NEEDED FOR PURCHASE. This item can be shipped directly to your house.”²⁷ The posting assures prospective buyers that “[p]er our extensive interaction with the ATF these are 100% Legal to sell to without the need of a FFL Transfer. We are making it easier than ever for the end user to manufacturer their own firearm.”²⁸

The Committee staff also identified another website advertising the sale of lower receivers that highlighted that “no FFL needed as it is not a gun until you complete it.”²⁹ This website for Advanced Rifles describes the product as “ubergrade AR-15 Lower Receivers. Ensuring freedom from tyranny, oppression and subjectification.”³⁰ The website specifically identifies California as a state that has passed targeted bans of rifles of certain makes and models.³¹ The website shows two models of 80% completed lower receivers and enables purchasers to select a single receiver or a five pack at a discounted rate. One model is described as “follow[ing] the standard AR-15 shape,” while the other is described as “[e]asier to machine and drill. ... This is a modernized shape.” The site notes that each model comes with “full blueprints and build instructions,” and explains that each “Ships direct to you, no FFL needed as it is not a gun until you complete it.”³²

²⁶ See State of California Department of Justice, Office of the Attorney General, *Frequently Asked Questions: Assault Weapon Registration* (online at <http://oag.ca.gov/firearms>).

²⁷ American Spirit Arms, *Posting on AR15.com* (May 20, 2011) (online at www.ar15.com/forums/t_2_274/204687_95__AR_15_Lower_Receiver__ATF_Approved____Shipping_Now_.html).

²⁸ *Id.*

²⁹ Advanced Rifles, *80% AR15 LOWERS* (online at www.advancedrifles.com/).


³⁰ *Id.*

³¹ *Id.*

³² *Id.*

Figure 1. “No FFL Needed” Lower Receivers

MODEL S




The Model S is a Partially Machined AR15 Lower. This 80% is a premium German spec R7075-T6 Forging, featuring our own in-house perimeter strengthen progressive forgings (read more), followed by 4-Axis CNC machining with a fully broached magazine well (using real broaching machines) all within milspec tolerances. This model follows the “standard” AR-15 shape and features a strengthened buffer tube support. Includes full blue-prints and build instructions. Ships direct to you, no FFL needed as it is not a gun until you complete it.

Typically Lead times is 5-6 Weeks (as of July 1, 2013)

SINGLE	FIVE PACK
ARS1SEF	ARS1SEF5
\$120.00	\$550 (\$110 EACH)
BUY NOW	BUY NOW

MODEL X



The Model X is our billet 80% receiver. It is an all CNC model starting with our premium German spec R7075-T6 billet, perimeter strengthen, with extensive 4-Axis CNC machining and a fully broached magazine well (using real broaching machines). Easier to machine and drill and has flatter, larger sides for custom engraving. This is modernized shape with a strengthened buffer tube. Includes full blue-prints and build instructions. Ships direct to you, no FFL needed as it is not a gun until you complete it.

Typically ships in 4-6 weeks (as of July 1, 2013)

SINGLE	FIVE PACK
ARX1SEF	ARX1SEF5
\$120.00	\$550 (\$110 EACH)
BUY NOW	BUY NOW

Source: Advanced Rifles

B. Some Gun Enthusiasts Are Promoting Partially Completed Lower Receivers to Circumvent Federal Serial Number Requirements for Firearms

Some gun enthusiasts are promoting partially completed lower receivers as a product that enables users to circumvent federal serial number requirements for firearms. One gun enthusiast linked to the American Spirit Arms website posted that a partially completed lower receiver was “[o]n sale for 129.99 No serial number no govt tracking.”³³

³³ Minnesota Gun Talk.com, *Posting by “The Lance”* (Dec. 17, 2012) (online at www.mnguntalk.com/viewtopic.php?f=27&t=36667).

The Committee staff investigation also identified images of some gun enthusiasts flaunting serial number requirements for firearms. In one image dated January 2013, an 80% completed lower receiver for an AR-15 firearm had a fraudulent serial number engraved.³⁴ Rather than a unique identifier, the owner of this lower receiver engraved “Gatz4Life” – slang for “guns for life” - in lieu of a serial number.

Figure 2. Engraved AR-15 Lower Receiver with Fraudulent Serial Number



Source: Calguns.net

C. Gun Sellers Are Using the Prospect of New Legislation Restricting the Purchase of Firearms as Part of Their Advertising Campaigns

Gun sellers are using the prospect of new legislation restricting the purchase of firearms as part of their advertising campaigns. One online retailer, Marsh Hawk Arms, told prospective purchasers:

I do not know if the gun-ban crowd will be trying to outlaw homebuilt guns as part of the ‘universal background check’ legislation they are pushing, but I wouldn’t put it past them. Now is obviously the time to make sure you have a receiver for every kit you have

³⁴ CalGuns.net, *Posting by AimsMall on AR-15 80% Building Party in San Diego on July 14 and 15, 2012* (May 10, 2012) (online at www.calguns.net/calgunforum/showthread.php?t=570558).

or will buy in the future. A kit won't do you any good if you don't have a receiver for it.³⁵

Some gun enthusiasts reinforce this message. One activist wrote a post titled "Legally Build an Unregistered AR-15."³⁶ He explained to readers the "current political climate," writing:

The current gun control push is mostly about "assault weapons", the erroneous term politicians use to demonize semiautomatic rifles like the AR-15. Again, how successful the politicians will be is yet to be determined, but make no mistake, they do not want us armed and will not give up their agenda easily. Their game plan is to, at minimum, ban these types of weapons, preventing anyone from legally purchasing one in the future, and then to force everyone who currently owns one to register it. And, as everyone who has studied the history of gun control knows, registration has always led to confiscation.³⁷

He posited his solution: "The trick is to have an unregistered weapon ... an unregistered weapon that you legally built yourself."³⁸ The blog post explained partially completed lower receivers and their legality, suggested individuals attend a build party in Southern California, and posted a video of a detailed tutorial explaining the process to finish an incomplete receiver.³⁹

A conservative blogger, Mac Slavo, wrote a post titled "How to Freak out Anti-Gunners: Build Your Own Untraceable AK-47." He summarized an article published by *Mother Jones* on the subject of "build parties" occurring in California where participants built untraceable AK-47s. Mr. Slavo posted:

As restrictive gun legislation, such as banning accessories or requiring registration of ammunition, is attempted across the nation, more Americans will turn to "underground" methods of making sure they have the means necessary to defend themselves from personal harm and the ever-looming possibility of a tyrannical overthrow of our country. They can push. But liberty minded Americans, many of whom still believe the right to bear arms is a fundamental tenet that no government can ever take away, will continue to push back.⁴⁰

³⁵ Marsh Hawk Arms, *April 25, 2013 UPDATE* (Apr. 25, 2013) (online at www.marshhawkarms.com).

³⁶ Brandon, *Legally Build an Unregistered AR-15* (Jan. 8, 2013) (online at mondermo.com/mondermo/legally-build-an-unregistered-ar-15).

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ Mac Slavo, *How To Freak Out Anti-Gunners: Build Your Own Untraceable AK-47* (May 27, 2013) (online at www.infowars.com/how-to-freak-out-anti-gunners-build-your-own-untraceable-ak-47-video/).

D. YouTube Videos and Gun Websites Provide Step-By-Step Tutorials on the Process for Building a Complete Assault Rifle from an 80% Partially Completed Lower Receiver

YouTube videos and gun websites provide step-by-step tutorials on the process for completing an 80% partially completed lower receiver. A simple search on YouTube of “AR-15 lower receiver” yields almost 75,000 results, many of which contain detailed information on completing this firearm component. One video providing a detailed explanation on how to build a lower receiver has logged over 128,000 views.⁴¹ Another video explains the exact process for assembling an AR-15.⁴²

Figure 3. YouTube Video “AR-15 Build (HOW To)”



Source: YouTube

The New Rifleman, a blog celebrating AR-15 firearms, provides a comprehensive visual guide explaining how to “easily put together your first AR-15.”⁴³ This presentation includes 60 individual pictures with detailed instructions to assemble the lower receiver.

⁴¹ YouTube, *ar-15 Lower Receiver Build* (July 22, 2011) (online at www.youtube.com/watch?v=CtPzwyPirQg).

⁴² YouTube, *AR-15 Build (HOW To:) Custom AR15 Build EASY CA Legal M4 Carbine in 10 minutes with Simple Tool* (Feb. 22, 2012) (online at www.youtube.com/watch?v=gNnsaagTGiE).

⁴³ The New Rifleman, *How to Build a AR15 Lower Receiver* (Mar. 6, 2011) (online at www.thenewrifleman.com/builds/rifle-builds/17-how-to-build-a-lower-receiver).

The initial slide instructs the viewer to “Gather the parts into the relevant part grouping.”⁴⁴

Figure 4. Excerpt from the New Rifleman Presentation



Source: The New Rifleman

The presentation continues, providing step-by-step instructions to builders of lower receivers. In one slide, the author explains how he used a pen to assist in the completion of the lower receiver.⁴⁵

Figure 5. Excerpts from the New Rifleman Presentation

⁴⁴ *Id.*

⁴⁵ *Id.*



Source: The New Rifleman

One commenter on the presentation posted that he was able to assemble his lower receiver “in about 10 minutes.”⁴⁶ Another noted, “Your walk through was perfect. I had no problems following it.”⁴⁷

E. Gun Owners in California Can Circumvent the California Assault Weapons Ban by Purchasing Complete Assault Rifle Parts Kits from Out-of-State Vendors

In addition to purchasing partially completed lower receivers, gun owners in California can circumvent the California assault weapons ban by purchasing kits that contain all parts to make an assault rifle and assembling them at home. Companies -- such as 44Mag Distributing located in Oregon, Cope’s Distributing located in Ohio, Brownells located in Iowa, and Exile Machine located in Texas -- ship complete, disassembled automatic rifles into California as “repair” or “rebuild” kits, ostensibly intended to repair registered weapons. These “parts kits” can be easily rebuilt into illegal, unregistered assault rifles.

Exile Machine boasts that they “gladly ship to California customers!” The website explains how the company circumvents the state’s restriction on AR-15 rifles with ammunition of greater than ten rounds:

If you purchase magazines which hold more than 10 rounds, we will automatically disassemble them into 100% legal repair/rebuild kits for compliance with CA law. We

⁴⁶ *Id.* at “Comments.”

⁴⁷ *Id.*

do not charge extra for this service. **Your invoice will clearly state (in ALL CAPS & BOLD) that you are receiving disassembled repair/rebuild kits.**⁴⁸

44Mag Distributing sells “California Large Capacity Magazine Repair Parts Kits.” According to the company website:

44Mag.com offers large capacity magazine repair kits for sale to California customers. These are sometimes also referred to as rebuild kits. **A magazine parts kit includes all of the parts of a magazine but the parts are not assembled into a magazine.** The cost of a kit is the cost of a complete magazine plus an additional service charge usually about \$1.49.⁴⁹

Brownells, a company located in Iowa, has over 1,600 items listed as an AR-15 related product.⁵⁰ It offers a wide range of semiautomatic parts kits that include “everything needed to complete a lower receiver,” with parts “conveniently packaged in sub-groups for easy location...during assembly.”⁵¹ Brownell’s best-selling parts kit, the “AR-15 Lower Receiver Parts Kit,” costs a mere \$35.99.⁵²

V. CONCLUSION

This investigation found a large loophole in California and federal gun control laws. Internet gun sellers are selling 80% complete lower receiver and assault rifle parts kits that allow individuals to circumvent California and federal background licensing requirements, serial numbers requirements, and restrictions on assault weapons. Moreover, the websites of these internet sellers actively promote their products as a way to avoid state and federal restrictions. This loophole undermines the effectiveness of the efforts of California and the federal government to keep weapons out of the possession of dangerous individuals.

⁴⁸ Exile Machine, *WE SHIP TO CA* (online at <https://www.exilemachine.net/shop/pages/we-ship-to-ca-9.html?zenid=6ef551et6q400gtgb9mmj267c2>).

⁴⁹ 44Mag.com, *California Large Capacity Magazine Repair Parts Kits* (online at www.44mag.com/product/california_large_capacity_magazine_repair_parts_kits).

⁵⁰ Brownell’s, *AR-15* (online at www.brownells.com/search/index.htm?k=AR-15&ksubmit=y).

⁵¹ Brownell’s, *AR-15/308AR Lower Parts Kits* (online at www.brownells.com/rifle-parts/receiver-amp-action-parts/parts-kits/ar-15-308ar-lower-parts-kits-prod55088.aspx).

⁵² Brownell’s, *AR-15 LOWER RECEIVER PARTS KIT* (online at www.brownells.com/rifle-parts/receiver-amp-action-parts/parts-kits/ar-15-lower-receiver-parts-kit-prod24955.aspx) at “231-000-258WB Lower Receiver Parts Kit.”